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Attorneys for Plaintiff
LAURI VALJAKKA

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-CV-01490-JST

**PLAINTIFF VALJAKKA'S RESPONSE
TO DEFENDANT NETFLIX INC.'S
NOTICE OF DISPUTE REGARDING
THE FORMAT, SCOPE, OR CONTENT
OF THE DECEMBER 12, 2022 CLAIM
CONSTRUCTION HEARING**

Judge: Hon. Jon S. Tigar

1 Plaintiff Lauri Valjakka (“Valjakka”) respectfully responds to Netflix, Inc’s (“Netflix”) 1
2 Notice of Dispute¹ by providing that it did in fact serve its proposed slides for the December 12, 2
3 2022 Markman Hearing on December 7, 2022. Upon sending the slides to Netflix, Valjakka’s 3
4 counsel asked if there was any objectionable material. Rather than provide a response as to 4
5 whether there was objectionable material in Valjakka’s slides, Netflix’s counsel responded that 5
6 they would not withdraw the Notice of Dispute. Valjakka acknowledges that it was late, but the 6
7 lateness was due to Valjakka preparing amended infringement contentions that were requested by 7
8 Netflix. Valjakka was able to supplement its contentions for the ‘167 patent based on what is 8
9 publicly available and what has been included in Netflix’s production. However, Valjakka has not 9
10 been able to supply further information to Netflix on the ‘102 patent other than what is publicly 10
11 available, which Netflix contends is inadequate, because Netflix has not produced further 11
12 information. Valjakka’s time was spent supplementing its contentions for Netflix and the 12
13 Markman slides were therefore late. 13
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16 Valjakka requests it is allowed to use its slides, subject to any objections from Netflix, and 16
17 that Netflix is required to produce documentation, protocols, and/or source code sufficient to 17
18 illustrate how Netflix’s Digital Rights Management (DRM) keys and Open Connect Appliances 18
19 19

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26 ¹ Doc. No. 69.
27

1 (OCAs) operate.

2 Dated: December 8, 2022

Respectfully submitted,

3 MAHAMED I IP LAW LLP

4 /s/ Susan S.Q. Kalra

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